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5 Attorneys for the Plaintiffs' Executive Committee appointed by the Superior Court of the State  
of California, in and for the County of Alameda, in Case No. RG16843631 and related cases.

6  
7 THE UNITED STATES BANKRUPTCY COURT  
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA  
8 SAN FRANCISCO DIVISION

9 In re:

10 **PG&E CORPORATION,**

11 -and-

12 In re:

13 **PACIFIC GAS AND ELECTRIC**  
14 **COMPANY,**

15 Debtors.

- 16 ☐ Affects PG&E Corporation  
17 ☐ Affects Pacific Gas and Electric  
Company  
18 ☒ Affects both Debtors

19 \* All papers shall be filed in the lead case,  
20 No. 19-30088(DM)

Case Nos. 19-30088 (DM)

Chapter 11

11 **JOINDER IN THE OBJECTIONS TO**  
12 **MOTION OF DEBTORS PURSUANT TO**  
13 **11 USC §§ 105(a), 363(b) AND 503(c)**  
14 **FOR ENTRY OF ORDER (I) APPROVING**  
15 **DEBTORS' INCENTIVE PROGRAM FOR**  
16 **CERTAIN KEY EMPLOYEES AND (II)**  
17 **GRANTING RELATED RELIEF FILED**  
18 **BY:**

- 1) **THE OFFICIAL COMMITTEE OF**  
**TORT CLAIMANTS; AND**  
2) **THE UNITED STATES TRUSTEE;**  
**AND**  
3) **TURN, THE UTILITY REFORM**  
**NETWORK**

DATE: July 24, 2019  
TIME: 9:30 A.M.  
PLACE: Courtroom 17  
450 Golden Gate Avenue,  
16<sup>th</sup> Fl.  
San Francisco, California  
JUDGE: Hon. Dennis Montali

RELATED DOCKET NOS: 2664, 3029,  
3030, and 3035

25 The Plaintiffs' Executive Committee, appointed by the Superior Court of the State of  
26 California, in and for the County of Alameda, Case No. RG16843631 and related cases  
27 (hereinafter referred to as the "Ghost Ship Warehouse Plaintiffs' Executive Committee"),  
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1 party in interest in the above-referenced Chapter 11 case, by and through its attorneys of  
2 record, joins in, and supports the Opposition of the Official Committee of Tort Claimants to  
3 Motion of Debtors Pursuant to 11 USC §§ 105(a), 363(b) and 503(c) for Entry of Order (I)  
4 Approving Debtors' Incentive Program for Certain Key Employees and (II) Granting Related  
5 Relief (Docket No. 3030). The Ghost Ship Warehouse Plaintiffs' Executive Committee  
6 reserves the right to join in any supplemental objection(s) filed by the Official Committee of  
7 Tort Claimants.

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9 In addition, the Ghost Ship Warehouse Plaintiffs' Executive Committee joins in, and  
10 supports the United States Trustee's Objection to Motion of Debtors For Entry of An Order  
11 Approving Key Employee Incentive Plan (Docket No. 3029). The Ghost Ship Warehouse  
12 Plaintiffs' Executive Committee reserves the right to join in any supplemental objection(s)  
13 filed by the United States Trustee.

14 In addition, the Ghost Ship Warehouse Plaintiffs' Executive Committee joins in, and  
15 supports the TURN, the Utility Reform Network's (hereinafter referred to as "TURN")  
16 Opposition to Motion of Debtors Pursuant to 11 USC §§ 105(a), 363(b) and 503(c) for  
17 Entry of Order (I) Approving Debtors' Incentive Program for Certain Key Employees and (II)  
18 Granting Related Relief (Docket No. 3035). The Ghost Ship Warehouse Plaintiffs'  
19 Executive Committee reserves the right to join in any supplemental objection(s) filed by the  
20 TURN.

21 The Ghost Ship Warehouse Plaintiffs' Executive Committee does hereby reserve  
22 the right to join in and support any additional opposition(s) filed by creditors and other  
23 parties in interest to the Motion of Debtors Pursuant to 11 USC §§ 105(a), 363(b) and  
24 503(c) for Entry of Order (I) Approving Debtors' Incentive Program for Certain Key  
25 Employees and (II) Granting Related Relief (hereinafter referred to as the "Motion for Entry  
26 of Order to Approve Key Employees Incentive Plan") (Docket No. 2664).

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1 Based upon the instant Joinder and the arguments to be presented during the  
2 hearing on July 24, 2019, the Ghost Ship Warehouse Plaintiffs' Executive Committee  
3 respectfully requests that the Motion for Entry of Order to Approve Key Employees  
4 Incentive Plan, be denied in its entirety.

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6 Dated: July 18, 2019

Respectfully submitted,  
PINO & ASSOCIATES

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10 By: 

11 Estela O. Pino, Attorneys for the Ghost Ship  
12 Warehouse Plaintiffs' Executive Committee  
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